

May 10, 1999

To whom this may concern,

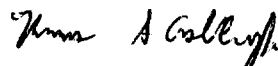
This following comments are referring to Docket #98N-1038, "Irradiation in the production, processing and handling of food". The comments concern the issues of 1) whether labeling of irradiated foods should remain, and 2) if so, what kind of labeling should be used.

Should irradiated food be labeled? Subtle chemical changes are induced, small amounts of formaldehyde and benzene other potentially toxic chemicals may be created. Vitamin content is reduced to varying degrees depending on the food, nutrient value, taste, and texture can be affected. Studies on the safety of irradiated food are inconclusive, and the laboratories performing these studies may in some cases be biased in favor of irradiation (one of them, Industrial Biotest Laboratories, was in 1983 found guilty of falsifying chemical poison tests for the EPA, so the objective integrity cannot be taken for granted). To do the kind of epidemiological study required to find out whether a diet of irradiated food will affect the frequency of cancer or genetic injuries in humans is not practically feasible. To be statistically significant it would have to involve controlling the diets of tens of thousands of humans of various age groups for 30+ years, preferably over their whole life spans. Such a study will not likely ever be done. Thus no one, on either side of this issue, really knows what the long-term implications of massive public consumption of irradiated food will be.

For the above reasons, and some others, many informed citizens would prefer not to consume irradiated food. If non-irradiated food is safe (aside from pesticides), why take a chance? A CBS News poll in 1997 indicated that 77% of US consumers do not want irradiated food. Fundamentally it is a public right-to-know issue. The public does have a right to know, and irradiated food, or any mixed food preparation that contains any irradiated food, should be appropriately labeled.

What kind of labeling should be used? It should be reasonably prominent so that an informed person could easily find it. The terms "irradiation" or "irradiated" should be used, along with the radura symbol. Other terms, such as "cold pasteurization" and "electronic pasteurization" are misleading and should not be used. Thankyou for your consideration.

Sincerely,

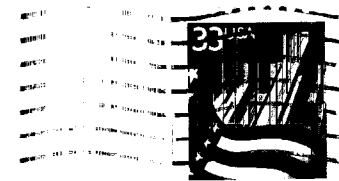


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